

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

V.

PATRICK McGOVERN-ALLEN

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CRIMINAL NUMBER 22-288-1

ORDER

AND NOW, this day of , 2022, upon consideration of the Defendant's Unopposed Motion for Continuance of Trial, it is hereby **ORDERED** that the motion is **GRANTED**. The Court finds that the parties need additional time to determine whether a non-trial disposition can be negotiated and if not the defense needs more time to prepare for trial. Pursuant to 18 U.S.C. § 3161(h)(7)(A), the Court finds that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Trial in this matter shall begin on the day of , 2022.

BY THE COURT:

THE HONORABLE GERALD J. PAPPERT
United States District Court Judge

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DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL

Patrick McGovern-Allen, by his counsel undersigned, respectfully requests that the Court continue the trial. In support of this request, it is stated:

1. On September 15, 2022, Mr. McGovern-Allen was arraigned before The Honorable Pamela A. Carlos and entered a plea of not guilty to the original indictment charging him with two counts of stalking in violation of 18 U.S.C. § 2261A(1) and aiding and abetting in violation of 18 U.S.C. § 2.

2. On October 27, 2022, a grand jury returned a superseding indictment charging Mr. McGovern-Allen with two counts of stalking in violation of 18 U.S.C. § 2261A(1), one count of use of fire in commission of a federal felony in violation of 18 U.S.C. § 844(h), and aiding and abetting in violation of 18 U.S.C. § 2. On November 1, 2022, Mr. McGovern-Allen entered a plea of not guilty before The Honorable Lynne A. Sitarski.

3. The trial is scheduled to begin on November 9, 2022.

4. The defense has received discovery in this case. Defense counsel needs additional time to review the discovery materials with Mr. McGovern-Allen, conduct necessary investigation and legal research, determine if a non-trial disposition is possible, and otherwise prepare for trial. A continuance of not less than sixty (60) days is respectfully requested.

5. Assistant United States Attorney Anthony J. Carissimi has no objection to this continuance motion.

6. Defense counsel stipulates that the time from the filing of this motion until the trial date is excludable time pursuant to 18 U.S.C. § 3161(h)(7)(A).

WHEREFORE, for the foregoing reasons, the defense respectfully requests that this motion be granted.

Respectfully submitted,

/s/ Nancy MacEoin
NANCY MacEOIN
Assistant Federal Defender

CERTIFICATE OF SERVICE

I, Nancy MacEoin, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I filed the attached Defendant's Unopposed Motion for Continuance of Trial via the Court's Electronic Filing (ECF) system, which sent notification to Anthony J. Carissimi, Assistant United States Attorney, Suite 1250, 615 Chestnut Street, Philadelphia, Pennsylvania 19106, via his email address Anthony.Carissimi@usdoj.gov.

/s/ Nancy MacEoin
NANCY MacEOIN
Assistant Federal Defender

DATE: November 2, 2022